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August 15, 2011

Sean Sheldrake  
Project Coordinator  
U.S. EPA, Region 10  
1200 Sixth Avenue, M/S ECL-111  
Seattle, Washington 98101

Re: July 2011 Monthly Progress Report  
Administrative Settlement Agreement and Order on Consent for Removal Action  
U.S. EPA Region 10 Docket No. CERCLA 10-2009-0255  
Gasco Sediments Site within the Portland Harbor Superfund Site

Project Number: 000029-02.28

Dear Mr. Sheldrake:

This monthly progress report provides information required by Section VIII, Paragraph 26, of the Administrative Settlement Agreement and Order on Consent for Removal Action (Order) for actions take in July 2011 at the Gasco Sediments Site within the Portland Harbor Superfund Site.

## **1. ACTIONS TAKEN IN THIS MONTH AND PROBLEMS ENCOUNTERED**

The following actions and correspondences occurred in this month:

- **July 1-31** – Continued completion of laboratory analysis and data validation on the samples collected during completion of the *Final Project AIR and Data Gaps QAPP* re-sampling addendum. Processed and integrated additional in-water bathymetry and upland topography survey data collected in the Area of Interest.
- **July 7** – The US. Environmental Protection Agency (EPA) provided comments on the *Segment 2 Field Tests of the Programmable Logic Control and Variable Frequency Drive Well Pumps* dated May 2011.

- **July 13** – Anchor QEA communicated to EPA that many of EPA's comments on the *Segment 2 Field Tests of the Programmable Logic Control and Variable Frequency Drive Well Pumps* will be addressed with modeling that will be conducted during development of the sediment *Engineering Evaluation/Cost Analysis* (EECA). Therefore, Anchor QEA proposed to provide response to EPA's comments in the EECA, rather than a separate deliverable.
- **July 15** – Anchor QEA submitted the Gasco Sediments Site monthly progress report to EPA.
- **July 16** – NW Natural communicated with EPA regarding scheduling a meeting in late August to discuss the results of the benthic toxicity re-testing sampling conducted as part of the EPA-approved addendum to the *Project Area Identification Reports and Data Gaps QAPP* and present the proposed alternatives to be carried through the *Draft EE/CA and Data Report*.
- **July 17** – EPA communicated to NW Natural that it expects NW Natural to provide the following information in the EE/CA relative to groundwater capture and sediment protectiveness:
  - Additional details regarding when hydraulic capture is assessed.
  - The criteria to be used for evaluating hydraulic capture and the adaptive contingency actions that can be made with sufficient lead time to ensure a sediment cap is protected from recontamination.
  - A chronological and explicit approach to assessment of complete hydraulic capture of groundwater flux exiting the site using all of the wells and piezometers instrumented with transducers.
  - A contingency plan of action for modifications (infrastructure and/or management of the system) when complete hydraulic control is not achieved that is timely enough to preempt recontamination of a sediment cap.
  - A monitoring plan with evaluation intervals that allow analysis with sufficient lead time for timely corrective actions.

## **2. RESULTS OF SAMPLING, TESTS, AND OTHER DATA RECEIVED**

The results of the monthly visual monitoring of the shoreline area in the direct vicinity of the pilot cap are provided as Attachment A. The field sampling results obtained during completion

of the EPA-approved *Final Project AIR and Data Gaps QAPP* and subsequent EPA-approved addendum will be reported in the *Draft EE/CA and Data Report*.

### 3. SCHEDULE OF ACTIVITIES FOR THE NEXT MONTH

Anchor QEA anticipates the following activities to occur in the next month:

- Submittal of the August monthly progress report.
- Completion of monthly visual monitoring of the pilot cap area.
- Completion of the data validation of the chemical analyses and receipt of the benthic toxicity results performed as part of the *Final Project AIR and Data Gaps QAPP* re-sampling addendum.
- Meeting between NW Natural, Siltronic Corporation and EPA to discuss the results of the benthic toxicity re-testing sampling conducted as part of the EPA-approved addendum to the *Project Area Identification Reports and Data Gaps QAPP* and present the proposed alternatives to be carried through the *Draft EE/CA and Data Report*.

### 4. ANTICIPATED PROBLEMS AND PROPOSED RESOLUTIONS

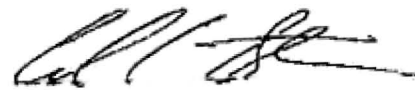
No problems or unforeseen conditions were encountered.

Please contact the undersigned if you have any questions or require additional information.

Sincerely,



Ryan Barth, P.E.  
Assistant Project Manager



Carl Stivers, Partner  
Project Manager

### Attachments:

Attachment A      Monthly Visual Monitoring Report for Pilot Cap Vicinity

Cc:

Bob Wyatt, NW Natural

Patty Dost, Pearl Legal Group PC

Tom McCue, Siltronic Corporation

Alan Gladstone and Hanne Eastwood, Davis Rothwell Earle and Xochihua

James Peale, Maul Foster Alongi, Inc.

Lance Peterson, Camp Dresser McKee

Matt McClincy, DEQ

Dana Bayuk, DEQ



## Visual Observations Log Form

<b>Date</b>	July 14, 2011	<b>Project Number:</b>	000029-02 BG-28 Task 3c
<b>Location:</b>	NW Natural "Gasco" Site		
<b>Project Name:</b>	NW Natural – Gasco		
<b>Monitoring Period:</b>	Monthly(Year 5)—July 2011		
<b>Time Observations Started:</b>	July 14, 2011 @ 14:30	<b>Time Observation Concluded:</b>	July 14, 2011 @ 15:30
<b>Weather Conditions:</b>	Mostly cloudy, high 60 – low 70 degrees Fahrenheit, winds 0-9 knots from the west.		
<b>Wave Action Observations:</b>	Light wave action (0.1 – 0.4 feet in height)		
<b>Photographs Taken:</b>	Yes	No	
<b>Tidal Conditions:</b>	Willamette River level on 07/14/2011 ranged in elevation from 8.36 to 9.47 feet. The Willamette River level during photos is approximately 8.38 feet measured at 15:00 (River Level Elevation Datum: Morrison Gage Height).		
<b>Observations of Erosion/Deposition:</b>	No erosion/deposition is evident along the shoreline. The shoreward extent of the cap was not visible. The river water elevation is lower than last month but the exposed organoclay mat material observed in preceding events was still not visible. (Photo 1).		
<b>Observations of Long-term Controls (i.e., oil booms, organo-clay mat, etc.)</b>	The Fuel and Marine Marketing (FAMM) containment boom is positioned across the cap area, between the upriver corner of the ship dock and the wooden dolphin (near the upriver extent of the site and near the Siltronic Corporation outfall). Buoys that identify the cap area to mariners are in place as installed. The position of the FAMM oil boom, warning buoys and a general overview of the site shoreline are shown in Photo 2.		
<b>Other Comments:</b>	No sheen is evident in or around the cap area. Photo 3 shows the water surface and shoreline immediately downriver of the sediment cap.		
<b>Recorded by:</b>	Douglas Laffoon		

Photo 1 — *River level currently elevated above the extent of sediment cap (07/14/11):*



Photo 2 — *FAMM oil boom and mariner warning buoys in place across pilot cap area (07/14/11):*





Photo 3 — *Conditions immediately downriver of cap area (07/14/11):*

